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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

EVELYN JONES,

Plaintiffs,

vs.

EQUIFAX INFORMATION SERVICES LLC, ET  
AL.

Defendants.

Case No.: 2:21-cv-02080-RFB-BNW

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEFENDANT  
WYNDHAM CONSUMER FINANCE,  
INC.'S DEADLINE TO RESPOND TO  
COMPLAINT**

**[FIRST REQUEST]**

Defendant, Wyndham Consumer Finance, Inc. ("Wyndham"), by and through its counsel, Armstrong Teasdale LLP, and Plaintiff Evelyn Jones, ("Plaintiff"), by and through her counsel, Kind Law and Freedom Law Firm, hereby agree and stipulate, subject to this Court's approval, to extend the deadline for Wyndham to answer or otherwise respond to the Complaint by thirty (30) days, or from December 20, 2021, to January 19, 2022. This is the first request to extend this particular deadline.

On November 20, 2021, Plaintiff filed a Complaint against Wyndham among others asserting a claim for violation of the Fair Credit Reporting Act, 15 U.S.C. § 1681. (ECF No. 1). Wyndham was served with the Summons and Complaint on November 30, 2021. Therefore, Wyndham's deadline to answer or otherwise respond to the Complaint is December 20, 2021.

Good cause exists to extend the deadline for Wyndham to respond to the Complaint by 30 days, or to January 19, 2022. Wyndham is in the process of identifying information and documents relevant to Plaintiff and the allegations in the lawsuit in order to prepare its response to the Complaint, including requesting additional identifying information from Plaintiff. As such,

Wyndham requires more time to respond to the Complaint. Plaintiff does not object to a 30-day extension of the response deadline. The parties believe that this first extension will not unduly delay proceedings as this case as it is still in its infancy and no scheduling order is currently in place. This stipulation is entered into in good faith and is not filed for improper purposes.

Accordingly, the parties request that this Court enter and order extending Wyndham's deadline to answer or otherwise respond to the Complaint by 30 days, or to January 19, 2022.

DATED this 14th day of December, 2021.

DATED this 14th day of December, 2021.

**KIND LAW**

**ARMSTRONG TEASDALE LLP**

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*Attorneys for Defendant Wyndham  
Consumer Finance, Inc.*

*Attorneys for Plaintiff Evelyn Jones*

**Order**

**IT IS SO ORDERED**

**DATED:** 4:57 pm, December 15, 2021



**BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE**